

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

JEFFREY ALONZO SIMMS,	:	
	:	
Plaintiff,	:	C.A. No. 04-1205-SLR
	:	
v.	:	
	:	TRIAL BY JURY OF
	:	TWELVE DEMANDED
HARRY M. FREEDMAN, M.D.,	:	
DONNA BURNS, DR., and	:	
MAJOR R. L. HUGHES,	:	
	:	
Defendants.	:	

**DEFENDANT HARRY M. FREEDMAN, M.D.'S  
RESPONSE TO PLAINTIFF'S MOTION**

COMES NOW, defendant Harry M. Freedman, M.D. (hereinafter referred to as "Dr. Freedman"), by and through undersigned counsel, hereby responds to plaintiff's Motion asserting that plaintiff has proved its damages, docketed on May 1, 2006, and states as follows:

1. This Motion is unintelligible and Dr. Freedman is unable to file a response thereto.

ELZUFON AUSTIN REARDON  
TARLOV & MONDELL, P.A.

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DATE: May 4, 2006  
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